

about the Wood Furniture Manufacturing Operations MACT

SBCA-FCM-0700

On December 7, 1995 the U.S. Environmental Protection Agency (EPA) published a final rule containing standards that limit the emissions of hazardous air pollutants (HAPs) from new and existing wood furniture manufacturing operations. These are nationwide standards intended to protect the public by requiring the control of HAP emissions through the use of maximum achievable control technology (MACT). The final rule is the result of a regulatory negotiation process that involved representatives from the furniture manufacturing industry (including small business), the coatings industry, environmental groups, and state and local air pollution control agencies.

Is My Business Affected?

This MACT standard applies to major sources nationwide that are engaged, either in part or in whole, in the manufacture of wood furniture or wood furniture components.

Wood furniture means any product that is manufactured under any of the standard industrial classification codes listed in **Table 1** and is made of wood, a wood product such as rattan or wicker, or an engineered wood product such as particle board. Wood furniture component means any part that is used in the manufacture of wood furniture.



Examples include, but are not limited to, drawer sides, cabinet doors, seat cushions, and laminated tops.

A facility is a major source if it emits or has the potential to emit, when considering control equipment, 10 tons per year or more of any HAP or 25 tons per year or more of any combination of HAPs. HAP emissions from all operations must be considered in determining if your plant site is a major source, including operations not associated with wood furniture manufacturing or finishing.

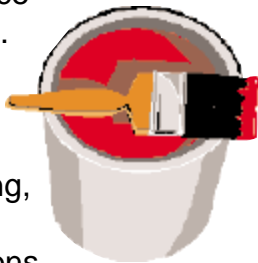
TABLE 1

SIC Code	Description
2434	Wood kitchen cabinets
2511	Wood household furniture, except upholstered
2512	Wood household furniture, upholstered
2517	Wood television, radio, phonograph, and sewing machine cabinets
2519	Household furniture, not otherwise classified
2521	Wood office furniture
2531	Public building and related furniture
2541	Wood office and store fixtures, partitions, shelving, and lockers
2599	Furniture and fixtures, not otherwise classified
5712	Furniture stores manufacturing custom cabinets

Exemptions

The following facilities are not subject to this MACT standard. You may be exempt under one of these provisions even if your facility is a major source.

❶ A manufacturer that is a major source but primarily manufactures products other than wood furniture or wood furniture components. If that facility uses no more than **100 gallons per month** of finishing material or adhesives in the manufacture of wood furniture or wood furniture components (an incidental wood furniture manufacturer). Purchase or usage records must be kept demonstrating that the source meets the material usage criteria.



❷ A manufacturer that never uses more than **250 gallons per month** of coating, gluing, cleaning, and washoff materials, including usage for manufacturing operations other than wood furniture or wood furniture components. Materials used in routine janitorial and facility grounds maintenance, for personal use by employees and others, or for maintaining motor vehicles operated by the facility may be excluded.

Coating, gluing, cleaning and washoff materials associated with wood furniture or wood furniture components must account for at least 90 percent of the manufacturer's annual HAP emissions. Records to demonstrate that the 90 percent criteria is being met, along with records of the total monthly gallons of coating, gluing, cleaning, and washoff material used must be maintained.

❸ A manufacturer that never uses more than **3000 gallons during any 12 consecutive month period** of coating, gluing, cleaning, and washoff materials, including usage for manufacturing operation other than wood furniture or wood furniture components. Those materials that may be excluded under the second exemption may also be excluded here.

The 90 percent criteria described under the second exemption also apply here. Records to demonstrate that the 90 percent criteria is being

met, along with records of the total gallons of coating, gluing, cleaning, and washoff material used each month and the total gallons used each previous month must be maintained. Because records are needed over a 12-month period, monthly records shall be kept beginning no less than one year before the final compliance date which would otherwise apply.

❹ A manufacturer that has actual emissions of no more than 5 tons of any one HAP, or no more than 12.5 tons of any combination of HAPs, including emissions from source categories other than wood furniture, during any 12 consecutive month period. At least 90 percent of the manufacturer's HAP emissions during the 12-month period must be associated with the manufacture of wood furniture or wood furniture components.

Records must be maintained to demonstrate that annual emissions do not exceed these levels, including monthly usage records for all finishing, gluing, cleaning, and washoff materials; certified product data sheets for these materials, and any other records necessary to document emissions from source categories other than wood furniture.

❺ Research or laboratory facilities are also exempt.

Synthetic Minor Restrictions to be Exempt

In addition to the above exemptions, your facility is not subject to this standard if you obtain a federally enforceable permit that limits your facility's potential HAP emissions to less than the major source levels. This is referred to as becoming a **synthetic minor source**. If your facility is a major source, you must either meet one of the exemptions described above or, prior to your facility's final compliance date, obtain a synthetic minor source permit to be unaffected by this standard. After your final compliance date, if your facility exceeds the exemption thresholds described above, and you have not obtained a synthetic minor source permit, your facility becomes a major source and you must then comply with all provisions of the MACT standard that pertain to your facility.

Compliance Schedule

Your final compliance date depends on:

- ❶ whether your facility is new or existing;
- ❷ the amount of your actual facility HAP emissions during 1996; and
- ❸ when your facility became a major source for HAPs.

An existing facility is one that was in existence on or before December 6, 1994. New facilities are those constructed after December 6, 1994. The following final compliance dates are specified in the rule:

☐ **December 7, 1998** for existing facilities that have actual emissions less than 50 tons of HAPs during 1996.

☐ **November 21, 1997** for existing facilities that have actual emissions equal to or greater than 50 tons of HAPs during 1996.

☐ Or if your existing facility is not a major source of HAPs now, but increases its actual or potential emissions such that it becomes a major source in the future, final compliance must be achieved **within one year** after becoming a major source.

☐ New major sources must comply immediately upon startup. A new facility that is not a major source, but which later becomes a major source, must comply **immediately** upon becoming a major source.

Initial Notification

Facilities affected by this standard must submit an initial notification. Since the U.S. EPA has delegated the responsibility to receive this information to Wisconsin's DNR, submit your initial notification by the appropriate deadline to:

Department of Natural Resources
Bureau of Air Management (AM/7)
P.O. Box 7921
Madison, WI 53707-7921
Attn: MACT Notification Coordinator

An initial notification is **long** overdue for an existing source. Submit one as soon as possi-



ble. For new sources, any affected source constructed or reconstructed after December 7, 1995, the notification is due within 120 days of initial startup.

Emission Limits

MACT includes limits on the volatile hazardous air pollutant (VHAP) content of finishing materials and contact adhesives, and on the VOC content of strippable spray booth coatings. See Table 2 in Attachment 1 for a summary of these limits and the methods required to comply. Because the list of VHAPs is quite long, refer to EPA's implementation guide document EPA-456/R-97-005. It is available on the web at www.epa.gov/ttn/uatw/wood/riwood.htm.

Work Practice Standards

In addition to numerical emission limits, work practice standards are included to reduce waste and evaporation of HAPs. See Appendix A for these standards. The work practice standards include good housekeeping and material tracking, employee training, inspection and maintenance, and application equipment restrictions. These practices focus attention on quality control issues that will result in the minimization of HAP and volatile organic compound emissions. Table 3 contains a summary of the work practice standards.

Record Keeping and Reporting

All facilities will be required to maintain records and provide periodic reports to the air pollution control agency. The specific records that must be maintained depend on the compliance demonstration method being used. Reports must be submitted to support and certify both initial and continuous compliance. The specific information that must be included in these reports depends on the compliance demonstration method being used. The initial compliance certification report is due no later than 60 days after your final compliance date. Subsequent reports to certify continuing compliance are due every 6 months thereafter.

Contacts for More Information or Assistance.

Department of Commerce

The Small Business Clean Air Assistance Program helps smaller businesses understand and comply with the Clean Air Act regulations. Contact one of the program's Clean Air Specialists for more assistance: Renée Lesjak Bashel at 608/264-6153 or Tom Coogan at 608/267-9214.

Department of Natural Resources

For further information on the Wood Furniture MACT contact your DNR Regional or Service Center office at the following addresses or the DNR's Central office at 608/266-2856. You can also contact the Bureau of Cooperative Environmental Assistance, Wood Product Sector Specialist, Laurel Sukup at 715/365-8936.

Solid & Hazardous Waste Education Center (SHWEC)

SHWEC offers free, non-regulatory, on-site pollution prevention opportunity assessments. For information, call 608/262-0385 or 414/227-3165.